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1 2 3 4 5 6	CUAUHTEMOC ORTEGA (Bar No. 2574) Federal Public Defender CALLIE GLANTON STEELE (Bar No. 1) (E-Mail: Callie_Steele@fd.org) Senior Litigator 321 East 2nd Street Los Angeles, California 90012-4202 Telephone: (213) 894-6075 Facsimile: (213) 894-0081 Attorneys for Defendant	143) 55442)
7	KIM MICHAEL SORGENTE	
8	UNITED STATES DISTRICT COURT	
9	DISTRICT OF COLUMBIA	
10	(WASHINGTON, DC)	
11		
12	UNITED STATES OF AMERICA,	Case No. CR 21-669-TJK
13	Plaintiff,	EX PARTE APPLICATION TO
14	v.	MODIFY RELEASE CONDITIONS
15	KIM MICHAEL SORGENTE,	
16	Defendant.	
17		
18	Defendant Kim Michael Sorgente, through his counsel of record, Senior Litigator	
19	Callie Glanton Steele, respectfully applies ex parte to the Court for an order modifying	
20	his release conditions. Specifically, he is requesting that the court vacate the location	
21	monitoring condition of his bond.	
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The government opposes this request. This ex parte application is based upon the attached declaration of counsel and all files and records in this case. Respectfully submitted, CUAUHTEMOC ORTEGA Federal Public Defender DATED: April 8, 2022 By /s/ Callie Glanton Steele CALLIE GLANTON STEELE Senior Litigator Counsel for Kim Michael Sorgente

DECLARATION OF CALLIE GLANTON STEELE

I, Callie Glanton Steele, declare:

- I am the Senior Litigator with the Office of the Federal Public Defender for the Central District of California and our office has been appointed to represent Kim Michael Sorgente in this matter.
- 2. Mr. Sorgente was arrested on October 25, 2021, in the Central District of California. [Docket No. 3].
- 3. On October 26, 2021, he made his initial appearance in the Central District of California and was released pursuant to certain conditions.
- 4. On November 4, 2021, Mr. Sorgente appeared telephonically for a bail hearing in the District of Washington, D.C. His was to remain released on certain conditions. One of those conditions was that he participate in Global Positioning System ("GPS") monitoring ("Location Monitoring"). [Docket No. 12 at 2-3 of 4].
- 5. On February 28, 2022, Mr. Sorgente had a hearing to review his release conditions and his conditions were modified slightly. [Text Only Order, dated February 28, 2022]. At that time, the Pretrial Services Agency was recommending that Mr. Sorgente's location monitoring condition be vacated. I requested that the location monitoring condition be vacated, the government opposed, and the Court indicated that it would consider vacating the location monitoring condition when Mr. Sorgente secured stable housing.
- 6. Mr. Sorgente has secured stable housing. I have conferred with Mr. Sorgente's pretrial services officer in the Central District of California, Officer Joey Trabucco, who indicate that Mr. Sorgente has stable housing. Mr. Trabucco indicated that he supports Mr. Sorgente's request for the vacating of his location monitoring condition.
- 7. I conferred with Assistant United States Attorney Katherine Nielsen regarding this request. Ms. Nielsen indicated that the government continues to object to the vacating of the location monitoring condition.

1	8. For these reasons, Mr. Sorgente requests that the location monitoring
2	condition be vacated.
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4	I declare under penalty of perjury under the laws of the United States of America
5	that the foregoing is true and correct.
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7	Executed on April 8, 2022, at Los Angeles, California.
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9	/s/ Callie Glanton Steele
10	CALLIE GLANTON STEELE Senior Litigator
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